

Kimberlee C. Morrow, OSB No. 830280
E-mail: kcm@hartwagner.com
1000 S.W. Broadway, Twentieth Floor
Portland, Oregon 97205
Telephone: (503) 222-4499
Facsimile: (503) 222-2301

Of Attorneys for Defendants City of Eugene, Jairo Solorio,
Andrew Roberts, Jacob Thomas, Robert Griesel

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
(EUGENE DIVISION)

ANZHELIKA PAYNE, Personal
Representative to the Estate of
LANDON JAY PAYNE,

Case No. 6:22-cv-00471-MC

Plaintiff,

v.

**DECLARATION OF KIMBERLEE
MORROW IN SUPPORT OF
UNOPPOSED MOTION FOR
EXTENSION OF DEADLINES**

JAIRO SOLORIO, an individual, **ANDREW
ROBERTS**, an individual, **JACOB
THOMAS**, an individual, **ROBERT
GRIESEL**, an individual, **JUSTIN WILSON**,
an individual, **ZACHERY FULTON**, an
individual, **EMMA GROTEFEND**, also
known as **EMMA EDWARDS**, an individual,
COLTER GAWITH, an individual,
NATHAN GENT, an individual, **MICHAEL
BAEUERLEN**, an individual, **STEPHEN
FOLEY**, an individual, **JOSEPH FISHER**,
an individual, **JEREMY FIFER**, an
individual, **WILLIAM MCCLURE**, an
individual, **LANCE JESTER**, an individual,
RICHARD CLINTON RILEY, an
individual, **CONNOR WEST SANTINI**, an
individual, **LANE COUNTY**, and **CITY OF
EUGENE**, a municipal corporation,

Defendants.

I, Kimberlee C. Morrow, declare as follows:

1. I am an attorney for Defendant City of Eugene, Jairo Solorio, Andrew Roberts, Jacob Thomas, Robert Griesel. I make this declaration based on personal knowledge, except where stated herein.
2. The parties seek an extension of the deadline for the close of discovery to May 17, 2024, and the dispositive motion deadline to July 17, 2024.
3. The parties have been engaging diligently in document discovery and depositions, but given the breadth and complexity of issues and the numerous named parties, we have been unable to complete discovery within the current deadline. We are attempting to set the depositions of several remaining parties and witnesses, but given the conflicting schedules of counsel, we do not anticipate being able to complete the depositions prior to April 15, 2024.
4. All counsel has been contacted and join in this request for an extension.
5. The motion is made in good faith and not for any improper purpose or delay. I am unaware of any prejudice that will result to any party if the Court grants this motion.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 11th day of April, 2024.

HART WAGNER LLP

By: /s/ Kimberlee C. Morrow

Kimberlee C. Morrow, OSB No. 830280
kcm@hartwagner.com
Of Attorneys for Defendants City of Eugene,
Jairo Solorio, Andrew Roberts, Jacob
Thomas, Robert Griesel

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of April, 2024, I served the foregoing

DECLARATION OF KIMBERLEE MORROW IN SUPPORT OF UNOPPOSED

MOTION FOR EXTENSION OF TIME on the following party at the following address:

Willow R. Hillman
Law Office of Willow Hillman
44 Broadway, Suite 222
Eugene, OR 97401
willow@willowhillmanlaw.com
Of Attorneys for Plaintiff

Derek Larwick
Keith A. Reed
Larwick Law Firm, PC
1190 West 7th Avenue
Eugene, OR 97402
Of Attorneys for Plaintiff

Andrea Coit
Hutchinson Cox
940 Willamette Street, Suite 400
PO Box 10886
Eugene, OR
Of Attorneys for Lane County, Justin Wilson, Emma Edwards,
Colter Gawith, Nathan Gent, Michael Baeuerlen, Stephen
Foley, Joseph Fisher, Jeremy Fifer, William McClure, Lance
Jester, Clint Riley, C. Santini

by e-filing a true and correct copy thereof, certified by me as such.

/s/ Kimberlee C. Morrow

Kimberlee C. Morrow